



FASULO BRAVERMAN & DI MAGGIO, LLP

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January 14, 2022

Hon. Mary Kay Vyskocil
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street.,
New York, NY 10007-1312

Re: United States v. Navarro et., al.
Case No.: 20 Cr. 160 (MKV)

Dear Judge Vyskocil,

We have conferred with the Government regarding Voir Dire questions. The parties agree that question 1-8 should be asked of the jury. The Government objects to questions 9 and 10. We request that you ask the potential jurors the following questions during Voir Dire:

1. Do you currently or have you ever owned any domestic pets? For example; a dog or a cat. If yes, do you have any veterinarian experience attending a veterinarian's office with your pets. Will that experience make it difficult for you to sit as an impartial juror?
2. Have you ever owned a horse as a pet, owned a horse for racing, or have you ever been a member of an Equestrian club? If yes, is there anything about these experiences that would affect your ability to be a fair and impartial juror in this case?
3. Are you a member or donor of an animal rights group or any group that advocated for the rights of animals? If yes, is there anything about this experience that would make it hard for your to be

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a fair or impartial juror?

4. Have you ever attended a horse race?
5. Have you ever watched a horse race on television?
6. Would you consider yourself an avid sports fan?
7. Have you ever gambled on sports?
8. Have you ever gambled on horse racing?
9. Do you or does anyone you know, take homeopathic substances as part of their health regiment?

Please name these substances and how often you would take them? Would your experience of taking these substances affect your ability to be a fair and impartial juror?

10. Do you or does anyone you know, take non prescription vitamins or supplements as part of their health regiment? Please name these substances and how often you would take them? Would your experience of taking these vitamins or supplements affect your ability to be a fair and impartial juror?

Very truly yours,

Louis V. Fasulo, Esq.
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